NPDES Roundtable Meeting Agenda - Draft (1/2/2019)

Skype Meeting, Hosted by North Coast Regional Water Board

January 9, 2019 9:00 AM - 3:00 PM

To join the online meeting: See appointment for Skype Link

To join the teleconference only:

+1 (888) 808-6929, access code: 460678

ITEM	1	Assigned to:	Time
Title of Topic	INTRODUCTIONS/REVIEW AGENDA AND ACTION ITEMS	Cathleen Goodwin Region 1	9:00-9:15 (15 minutes)
Purpose	Region 1: Cathy Goodwin, Heaven Moore Region 2: Robert Schlipf and Bill Johnson Region 3: Phil Hammer and Harvey Packa Region 4: Cassandra Owens and Jeong-Region 5: Jim Marshall and Kari Holmes Region 6: Russel Norman Region 7: Kai Dunn and Jose Valedeleon Region 8: Mark Smythe, Brian Harris, and Region 9: Brandi Outwin-Beals State Board: Afrooz Farsimadan, Armand Jarma Bennett EPA: No one present PG Environmental: Audrey Signorelli, Dar	ard Hee Lim I Jayne Joy o Martinez, Diana Messina	a, Erin Mustain,
Desired Outcome	Get attendance and finalize agenda.		
Background	3		
Contact Person	Cathleen Goodwin (707-576-2687), <u>Cathleen.Goodwin@waterboards.ca.gov</u> Heaven Moore (707-576-2753), <u>Heaven.Moore@waterboards.ca.gov</u>		
Notes			
Decisions			
Action Items			

ITEM	2	Assigned to:	Time
Title of Topic	SWRCB NPDES PROJECT UPDATES	SWRCB-DWQ	9:15-9:45 (30 Minutes)
Purpose	Update NPDES Roundtable regarding several SWRCB Projects and Statewide Language Implementation		
Desired Outcome	Update the Roundtable		
Background	Update the NPDES Roundtable on:		

Contact Person	Pretreatment Standard Operating Procedures NPDES Administrative Procedure Manual Update Permit Template Revisions for Bacteria and Toxicity Language NPDES Quality Assurance Program Plan Implementation Afrooz Farsimadan (916) 341-5544 Renan Jauregui (916) 341-5505
Notes	 Armando Martinez (916) 341-5586 PG Environmental has prepared SOPs for pretreatment. This was sent to all Regional Board program managers for feedback. Since PG will be losing contract support, the State Board will try to organize trainings soon. The SOPs focus on developing local limits as opposed to reevaluating local limits. Region 1 pointed out that it might be helpful to get guidance on the reevaluation process of local limits. The 2004 EPA guidance document refers to a worksheet to help guide permittees through the process – there was some thought as to whether we should develop our own worksheet. At this point, we would need to do this on our own as PG has expended most available funds in developing pretreatment SOPs. State Board would like feedback from program managers on the current version of the Administrative Procedures Manual. So far, State Board has only received feedback from Region 2 and requests that other regions provide input. We discussed how Regional Boards can provide feedback on updating the permit template to include toxicity and bacteria language. The thought is that we should draft language sooner than later. As the bacteria provisions should be approved by the OAL and EPA within a few months, new bacteria language should be prioritized. PG will be taking over the lead for the NPDES Quality Assurance workgroup and plans to provide draft guidance documents and checklists by the end of June.
Decisions	As the Regional Boards use the pretreatment SOPs, we will try to revise them over time (ongoing item)
Action Items	Regional Board Program Managers should provide Afrooz (1) feedback on the APM by Feb 28, and (2) draft permit language for toxicity and bacteria by Jan 18.

ITEM	3	Assigned to:	Time
Title of Topic	RECYCLED WATER REPORTING REQUIREMENTS PER THE RECYCLED WATER POLICY	Rebecca Greenwood State Board	9:45-10:15 (30 Minutes)
Purpose	To inform the NPDES Roundtable of the new recycled water reporting requirements to be implemented per the recently adopted Recycled Water Policy.		
Desired Outcome	Information sharing		
Background	On December 11, 2018 the State Board adopted an amendment to the Recycled Water Policy. This discussion will focus on implementation of the new wastewater and recycled water reporting requirements that are part of the Policy amendment.		

Attachments/ Links:	NPDES_Recycled Water Monitoring.p
Contact Person	Rebecca Greenwood – 916-341-5858, rebecca.greenwood@waterboards.ca.gov
Notes	Rebecca explained that the Recycled Water Policy directed the Executive Director to issue a 13267 Order requiring electronic reporting of recycled water data. This is to ensure that we're getting better information to evaluate whether we're achieving statewide goals for recycled water use. The first annual report will be due April 2020 covering recycled water use from 2019. The State Board is trying to define definitions of treatment. They may use a survey wizard to learn treatment levels at each wastewater treatment plant. It was mentioned that DFA has done a survey of treatment technologies from all wastewater treatment plants and that this might be a good resource. As the State Board standardizes treatment definitions, it may request more feedback from the NPDES Roundtable on evaluating definitions of treatment and whether this is consistent with what we include in NPDES permits.
Decisions	None
Action Items	Rebecca provided her presentation (see attachment).

ITEM	4	Assigned to:	Time
Title of Topic	SUFFICIENTLY SENSITIVE METHODS RULE IMPLEMENTATION	Jim Marshall Region 5	10:15-10:30 (15 Minutes)
Purpose	Share information and receive feedback from other Regions that are implementing the SSM Rule.		
Desired Outcome	Information sharing/feedback		
Background	Information sharing/feedback With the recently promulgated Sufficiently Sensitive Methods Rule (SSM Rule), for many constituents the SIP Minimum Levels are no longer the driving factor for the laboratory Reporting Levels that Discharger's must meet when submitting monitoring data required by NPDES permits. Region 5 has been working on developing a process to implement the SSM Rule in a manner that is clear and efficient for Dischargers and staff. The SSM Rule requires Dischargers use laboratory Reporting Levels that are closest to or below applicable water quality objectives considering the capability of commercial laboratories. Region 5 has developed a revised version of its Effluent		
	and Receiving Water Characterization Table reporting levels for each constituent that we SSM Rule based on a survey of commercial	determined to be in comp	oliance with the

	Region 5 staff have been focusing on this effort for some time now with the ultimate goal that the use of lower RLs will result in higher quality data that can be used for data evaluations. We are interested in input related to the following: 1. We have surveyed commercial laboratories within our region to determine laboratory capabilities in terms of MDLs and RLs. Have other Regions done the same? How many labs should be surveyed? How often to resurvey? 2. We plan to list Max RLs in the MRP table for the Effluent and Receiving Water Characterization Monitoring to provide clear direction to dischargers for SSM Rule compliance, and to make the process of evaluating compliance with the SSM Rule more consistent and easier on staff. What are other Regions doing? 3. It is unclear in the SSM Rule whether economic considerations can be made on a case-by-case basis. We have small disadvantaged communities where it would be difficult to have samples delivered to the labs that can meet the RLs that we have determined complies with the SSM Rule. Does USEPA have any guidance regarding the allowance for exceptions on a case-by-case basis? What would be some of the considerations?
Attachments/ Links:	
Contact Person	Jim Marshall (916-464-4772), james.marshall@waterboards.ca.gov Dania Jimmerson (916-464-4742), <u>dania.jimmerson@waterboards.ca.gov</u>
Notes	To implement the SSM, Region 5 has developed maximum reporting limits to comply with the SSM rule based on lab surveys. Region 5 sent a template to six labs across its region (Redding, Fresno, and Sacramento) to develop these reporting limits. Region 5 mentioned some concerns about how to account for economic considerations since some dischargers may be located in remote areas and not have access to higher performing labs. Based on its survey, Region 5 learned that there is a laboratory within each area (Fresno, Sacramento, and Redding) that can meet the reporting levels they are planning to propose. Another concern that Region 5 mentioned is that if it includes reporting levels in permits, it may be difficult to change them. Region 2 mentioned that it has narrative language that requires dischargers to use the most sensitive method and that it would evaluate on a case by case basis whether a pollutant needs a lower reporting level. There was some more discussion on the merits of including reporting levels in permits. To allow for more timely revisions and flexibility, there appeared to be consensus that it's probably more useful to have an informational document about reporting levels on our website as opposed to including them in permits. There were also some thoughts on trying to fold this effort into the NPDES Quality Assurance Program Plan.
Decisions	Region 5 may want to post reporting levels to its website instead of including them in permits.
Action Items	Erin Mustain may report on how other states implement the SSM rule (if she learns more about this issue).

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BREAK 10:30-10:45 (15 minutes)

ITEM	5	Assigned to:	Time
Title of Topic	REGION 1 WATER QUALITY TRADING FRAMEWORK FOR THE LAGUNA DE SANTA ROSA	David Kuszmar/Lisa Bernard (R1)	10:45-11:15 (30 minutes)
Purpose	Provide an overview of the Region 1 Wate Laguna de Santa Rosa	er Quality Trading Framewo	ork for the
Desired Outcome	Information sharing		
Background	Information sharing On July 11, 2018, the North Coast Regional Water Board adopted Resolution No. R1-2018-0025 approving the Water Quality Trading Framework for the Laguna de Santa Rosa Watershed (Laguna WQT Framework). The Laguna WQT Framework is a revised, expanded, and improved version of the Santa Rosa Nutrient Offset Program, and is available to both the City of Santa Rosa and the Town of Windsor as an approved means of complying with "no net loading" effluent limitations for total phosphorus in each of their NPDES permits. The Framework encourages the City and the Town to achieve compliance by implementing multi-benefit pollution reduction actions and ecosystem restoration projects within the Laguna watershed in lieu of facility upgrades that are more costly and less effective for achieving phosphorus reductions that are needed in the Laguna. The Laguna WQT Framework is the first of its kind in California. Its provisions are based on USEPA policy, guidance from national experts, and years of collaborative discussions with local stakeholders. If successfully implemented, it will serve as proof-of-concept for the expanded future use of water quality trading as a viable element of the North Coast Regional Water Board's comprehensive strategy for beneficial use recovery in the Laguna de Santa Rosa.		
Attachments/ Links:	Links to the Laguna WQT Framework, the adopting Resolution, and the subject NPDES permit are available here: https://www.waterboards.ca.gov/northcoast/water_issues/programs/nutrient_offset_program/ 190109_Laguna_W QT_Framework_CLEA		
Contact Person	David Kuszmar (707-2693), <u>David.Kuszm</u> Lisa Bernard (707-576-2677), <u>Lisa.Berna</u>		

Action Items	David provided his presentation (see attachment).
Decisions	None
Notes	This was an informational item. Region 1 covered the pre-TMDL trading framework it developed for Laguna de Santa Rosa watershed (large freshwater wetland complex), which is currently impaired for phosphorus. There are two wastewater treatment plants that discharge to this watershed (Windsor and Santa Rosa) and they have requirements of no net loading for phosphorus. Basically, this requires these two facilities to implement phosphorus reduction elsewhere in the watershed. The no net loading requirement started in 2006 with a five-year compliance schedule. This was extended through a time schedule order to give more time. To develop offsets for phosphorus, the most attractive projects are probably dredging projects to get at phosphorus buildup in sediments, coupled with restoration to provide a longer-term benefit. In a related effort, Region 6 mentioned a trading program it developed for Lake Tahoe to improve water clarity. This was first approved related to actions on stormwater. Region 6 indicated that there was some public distrust in using a market-based approach.

ITEM	6	Assigned to:	Time
Title of Topic	UPDATE ON THE STATE SSS WDR REISSUANCE	SWRCB-DWQ	11:15-11:35 (20 minutes)
Purpose	Update the Roundtable regarding the State S	SSS WDR Reissuance	
Desired Outcome	Information sharing		
Background	An update was provided at the October 18, 2018 NPDES Roundtable meeting that generated much discussion about the use of a subcommittee as the avenue for Regional Boards to provide input on the WDR revision. The attached documents show the WDR reissuance schedule and the project charter for discussion.		
Contact Person	Afrooz Farsimadan (916) 341-5544 Armando Martinez (916) 341-5586		
Notes	Armando Martinez (916) 341-5586 The State Board mentioned a number of proposals for the new Sanitary Sewer System WDRs. There was some discussion on establishing two performance classes. Class A systems would be agencies that have a low spill rate per mile, low spill volume per mile, and greater than 75% certified operators for collection systems. As a reward for being well run, Class A systems would only need to conduct self-audits every six years, whereas, Class B systems would need to continue conducting self-audits every 2 years. The State Water Board indicated that its goal is to incentivize collection systems to put more resources towards certified operators and better run systems. There was agreement with this goal and other regions were not opposed to using incentivizes; however, there were some concerns.		

Region 9 mentioned that some agencies may be severely underreporting spills. This would effectively result in a low spill rate per mile, and low spill volume per mile; which could result in an undeserved Class A classification. In sum, the Regional Boards want to better understand how the State Water Board develops this incentive because we don't want to inadvertently incentive reduced spill reporting.

On process, the State Board plans to brief board members in February. One possible change is to issue an NPDES permit instead of WDRs to regulate sanitary sewer systems. State Board is going to ask its board members for guidance on this issue. Erin Mustain voiced some concerns about switching to an NPDES permit because of the additional workload this would require such as ICIS coding and DMR submittals.

Region 9 suggested that the State Board review the administrative record it prepared for its most recent collection systems order. Apparently, Region 9 addressed the issues of NPDES vs WDR, and regulating private communities in detail.

The State Board said that it wanted to make sure Regional Board concerns are addressed in the draft order/permit. The State Board wants information on where we have issues with enforcement and what's really important for inclusion. The State Board does not want to sift through nine different set of comments from Regional Boards. To assist with this effort, the State Board would like a Regional Board lead from the sub-committee to get a better idea of what needs to be included in the collection system order/permit.

Region 9 pointed out this it was uncomfortable leading a sub-committee because it didn't want to block comments from other regional boards and requested that the State Board take the lead. This issue was unresolved. To move things forward, Afrooz agreed to schedule the first meeting of the collection systems sub-committee.

Attachment	AMartinez SSS Order Presentation.
Decisions	State Board may want to consult the Region 9 administrative record
Action Items	Armando provided his presentation (see attachment). Afrooz will check with Regional Board Program Managers on staff outside of NPDES that may work on the Sanitary Sewer WDRs. Afrooz will schedule the first subcommittee meeting for the Sanitary Sewer WDRs.

ITEM	7	Assigned to:	Time
Title of Topic	UPDATE ON EPA NPDES PERMITS PERFORMANCE CRITERIA	EPA	11:35-12:00 (25 minutes)
Purpose	EPA has been working to develop performance criteria that would allow EPA to evaluate programs across states as far as implementation of programs receiving grant funding. EPA has discussed the criteria at past roundtables and would like to share the draft results and status of the project during this roundtable meeting.		

Desired Outcome	Information sharing and review of draft pilot results	
Background	EPA R9 will be developing criteria in collaboration with states (and each RB) for each program that receives funding from EPA. The NPDES permitting program was selected as a pilot. The purpose of the criteria is to assess relative performance across states and programs as well as making EPA's expectations as transparent as possible. EPA presented draft criteria at the January 2018 roundtable, had a subsequent call on February 20, and discussed the status of the pilot on the April 2018 roundtable.	
Contact Person	Becky Mitschele, 415-972-3492 or mitschele.becky@epa.gov	
Notes	We canceled this item because of the federal government shutdown.	

LUNCH BREAK 12:00-1:00 (1 hour)

ITEM	8	Assigned to:	Time
Title of Topic	PERMIT ISSUANCE PLANS FOR SFY18-19 AND SFY 19-20	EPA	1:00-1:20 (20 minutes)
Purpose	Update NPDES staff		
Desired Outcome	Information sharing and preview of template for permit issuance plan, as required by the 106 workplan		
Background	EPA expects the SB to work with the RBs to reduce the NPDES permit backlog as well as provide the permit issuance plan as required by the 106 workplan. Specifically, the 106 workplan requires that the SB based on input from each RB prepare semi-annual updates to the annual permit issuance plan due March 1 and September 1. By March 1 of each year, the SB will also prepare based on RB input a permit issuance plan for the upcoming SFY (July to June). Proposed permit issuance dates are to be provided at least 6 months prior to permit expiration.		
Contact Person	Becky Mitschele, 415-972-3492		
Notes	We canceled this item because of the federal government shutdown.		

ITEM	9	Assigned to:	Time
Title of Topic	EPA GENERAL UPDATES	EPA	1:20-1:35 (15 minutes)
Purpose	Status updates regarding EPA rulemakings, management changes, and upcoming PQR		
Desired Outcome	Information sharing		
Background	Rulemakings a. NPDES Application and Program Updates b. Peak flows management c. Waters of the U.S. proposed rulemaking closes 60 days from publication in FR		

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Attachments/ Links:	2. NPDES Section Chief – Elizabeth Sablad 3. CA Permit Quality Review (PQR) 1. Links to EPA rulemakings https://www.epa.gov/npdes/npdes-application-and-program-updates https://www.epa.gov/npdes/peak-flows-sewage-treatment-plants https://www.epa.gov/wotus-rule/step-two-revise and direct link to signed pre-publication version https://www.epa.gov/wotus-rule/revised-definition-waters-united-states-proposed-rule 3. Link to 2014 CA PQR for SB, RB2, RB4, RB5, and RB9 https://www.epa.gov/sites/production/files/2015- 09/documents/pgr_california_report.pdf
Contact Person	Becky Mitschele, 415-972-3492 or mitschele.becky@epa.gov
Notes	We canceled this item because of the federal government shutdown.

ITEM	10	Assigned to:	Time
Title of Topic	DFA UPDATE REGARDING PROCESSING OF CWSRF APPLICATIONS	Jim Maughan	1:35-2:10 (35 Minutes)
Purpose	To provide an overview regarding the processing and approval of applications for grant/loan funding		
Desired Outcome	To help Regional Board staff to understand the DFA funding application process and to provide an update on the status of applications currently being processed		
Background			

Attachments/ Links:	https://www.waterboards.ca.gov/water_issues/programs/grants_loans/srf/docs/november_2018_cwsrf_iup_update.pdf	
Contact Person	Jim Maughan, (916-341-5694), james.maughan@waterboards.ca.gov	
Notes	This item covered how the State Board allocates limited resources to communities seeking grants or loans. The State Board has a continuous application process. There are four packets that need to be submitted: (1) general package – funds requested, who's requesting; (2) technical package – engineering design, costs; (3) environmental package – impacts to cultural resources, etc., and (4) financial package- information on audited reports, rate structure to document ability to pay or continue operating. Because funding is with both state and federal dollars, applicants need to follow the most restrictive requirements (federal). For incomplete applications, the State Board informs the applicant of what's incomplete and expects them to sort things out. For a disadvantaged community, the State Board will assist them or even complete the application. Typically, the slowest part of the application process is the environmental package – impacts to cultural resources, U.S. Fish & Wildlife Service (consulting). The next bottleneck is typically legal consultation with large agencies – they generally have debt and a lot of other projects. This adds additional time. There were questions about how the State Board determines whether it should provide a grant and loan. It turns out that the only communities that can receive grants are small and disadvantaged (<20,000 an below 80% of the State median income). The reason that State Board is not providing grants to large disadvantaged communities is because they still have economies of scale. The State Board receives about \$7-8 Billion per year in funding requests; however, it only has about \$1B per year available. The State Board uses a scoring and ranking system to determine communities that should receive funding in the next fiscal year. If a community does not receive funding, they need to reapply and hope to get ranked higher. For large disadvantaged communities, if they receive an equal ranking with another community, they will be given priority for funding. The DFA is	
Decisions	should just apply for funding and let the State Board sort out the source. None	
	Jim Maughan sent out a link that includes DFA status on applications.	
Action Items	https://public.waterboards.ca.gov/dfaAppSTAT/	

ITEM 11 Assigned to: Time			
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Title of Topic:	REGION 1 UPDATE ON RECENT PERMIT LANGUAGE MODIFICATIONS Heaven Moore 2:10-2:30 (20 minutes)		
Purpose:	Share information and receive feedback regarding proposed changes to permit language in Region 1 permits.		
Desired Outcome:	Information sharing and feedback.		
Background:	Region 1 staff have identified several permit language issues during the development of a few recent permits. We are interested in feedback from the NPDES Roundtable group on the following: 1. Permit language to clarify that dischargers are not exempt from regulations that are not specifically addressed in their permit. For example, we are developing a permit for a sawmill and this permit's Solids Disposal and Handling Requirements allow the potential for burning of waste piles as a solids disposal method. Our new NPDES Program Manager said that permits that she wrote in her prior position included language to inform permittees that they must comply with regulations of other agencies as they implement requirements of their NPDES permit. In this sawmill example, such language would be intended to clarify that the discharger must comply with air quality regulations and local regulations related to burning. 2. If a permit receiving water limitation is expressed in a manner that implies the possibility of continuous monitoring, are we mandated to require continuous monitoring or do we have flexibility to require grab sampling if grab sampling demonstrates that there is little threat of violating the limit? We encountered this situation recently as we have a new Basin Plan receiving water limitation for dissolved oxygen that establishes a daily minimum of 9.0 mg/L and a 7-day moving average of 11.0 mg/L. In order to clearly demonstrate that there are never excursions of the minimum or the 7-day moving average, one would technically need continuous monitoring due to the diel nature of DO. Requiring continuous receiving water monitoring is costly and difficult, therefore, for cost of compliance and practical reasons, we are not requiring continuous monitoring based on an analysis of existing monthly upstream and downstream monitoring data. How do other Regional Boards establish receiving water monitoring requirements in situations like this? 3. How do other regional boards address monitoring for short hold-time and		
Attachments/ Links:			
Contact Person:	Heaven Moore, (707-576-2753), <u>Heaven.Moore@waterboards.ca.gov</u>		

Notes:	 There was a discussion about whether we should add language in NPDES permits that explains the discharger is still subject to other requirements. Region 2 indicated that we should not include this language in the enforceable part of the permit because we don't have the authority under the NPDES program to require it. We could include such language in the Fact Sheet, similar to the endangered species language from the permit template. The consensus seems to be that grab samples for dissolved oxygen are adequate for evaluating compliance. For field measurements, Erin Mustain indicated that Region 5 has developed good language and would pass it along. For demonstration of compliance with chlorine limits, Region 2 allows the use of stochiometric analysis to show adequate dechlorination. Region 5 allows bisulfite monitoring to show adequate dechlorination. 		
Decisions:	None.		
Action Items:	Erin Mustain will provide permit language for field measurements to Region 1. Robert Schlipf will provide permit language to Region 1 on demonstrating adequate dechlorination using a stochiometric analysis.		

ITEM	12	Assigned to:	Time
Title of Topic	REGIONAL BOARD UPDATES	All	2:30-2:45 (15 minutes)
Purpose	Brief Updates on Regional Board issues		
Desired Outcome	Information Sharing		

Notes Decisions	mentioned training opportunities with local commercial labs – Caltest in Napa and Pacific EcoRisk in Fairfield. Region 6 – They have a Basin Plan prohibition on pesticide use. They are working on an exemption process that would allow for pesticide discharges under the General Permit. Region 7 – no further updates. Region 8 – no further updates. Region 9 – This was an update on permitting. Region 9 recently released a tentative order for the Carlsbad desalination permit, which they have been working on for nearly three years. Region 9 is also working on its first indirect potable reuse project for the City of San Diego. This will be a discharge into a drinking water reservoir, which may eliminate the need for imported water. State Board – This was an update on significant noncompliance list. The State Board has been making sure that NPDES facilities in significant noncompliance are under appropriate Time Schedule Orders or Cease and Desist Orders. If so, these facilities will no longer stay on the SNC list. This task is close to being finished. Region 4 may provide an update on mercury permitting at the next Roundtable.
	Region 1 – no further updates. Region 2 – On staffing, Mary Boyd who led Region 2's section on General Permits and Collection Systems has moved to the State Water Board. Region 2 also provided an update on its Nutrient Watershed Permit. Region 3 – no further updates. Region 4 – For mercury, Region 4 has a permit where it needs to determine the highest annual average to evaluate reasonable potential. This turned out to be very complicated and may be a good item for the next Roundtable. Region 5 – This was an update on using the Notice of Applicability under the new General Permit for Limited Threat Discharges to Surface Waters. In the next few months, Region 5 will be covering five or six facilities and will get a better idea on how much time they are saving by having this General Permit. Region 5 also

ITEM	13	Assigned to:	Time
Title of Topic	WRAP UP	Cathleen Goodwin Heaven Moore	2:45-3:00 (15 minutes)
Purpose	Wrap Up and Conclude Meeting		
Desired Outcome	Summarize action items from this meeting, potential agenda items for future meetings, and confirm future meeting date.		
Background	Discuss next quarterly meeting location and decide whether teleconference or face to face. Decide on note taker.		
Attachments/ Links:			
Contact Person	Cathleen Goodwin (707-576-2687), <u>Cathleen.Goodwin@waterboards.ca.gov</u> Heaven Moore (707-576-2753), Heaven.Moore@waterboards.ca.gov		
Notes			
Decisions	May 1 for next Roundtable Meeting.		

	Afrooz will schedule a meeting with EPA to discuss performance criteria and permit
Action Items	issuance plans before the next Roundtable.